

Baker & Hostetler LLP

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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and Bernard L.
Madoff,

Plaintiff,

v.

BAM L.P., Michael Mann, and Meryl Mann,

Defendants.

Adv. Pro. No. 10-04390 (SMB)

**DECLARATION OF DAVID J. SHEEHAN IN SUPPORT OF
TRUSTEE'S REPLY MEMORANDUM OF LAW IN FURTHER SUPPORT OF
MOTION FOR SUMMARY JUDGMENT**

I, David J. Sheehan, declare the following:

1. I am a Partner with the firm of Baker & Hostetler LLP, counsel to Irving H. Picard, as trustee (“Trustee”) for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.*, and the chapter 7 estate of Bernard L. Madoff.

2. I submit this Declaration in support of the Trustee’s Reply Memorandum of Law in Further Support of Motion for Summary Judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure, made applicable by Rule 7056 of the Federal Rules of Bankruptcy Procedure.

3. Attached hereto as Exhibit 1 is a true and correct copy of the Declaration II Regarding JPMorgan Bank Records, dated December 13, 2017, executed by document review senior specialist Linda Coribello, a custodian of records for JPMorgan Chase Bank, N.A. in the Subpoena Compliance Group.

4. Attached hereto as Exhibit 2 is a true and correct copy of the Declaration III Regarding JPMorgan Bank Records, dated December 13, 2017, executed by document review senior specialist Linda Coribello, a custodian of records for JPMorgan Chase Bank, N.A. in the Subpoena Compliance Group.

5. Attached hereto as Exhibit 3 is a true and correct copy of the JPMorgan Chase account statement for Bernard L Madoff Investment Securities, account ending in -509, from April 1 through April 30, 2003.

6. Attached hereto as Exhibit 4 is a true and correct copy of the JPMorgan Chase account statement for Bernard L Madoff Investment Securities, account ending in -509, from December 1 through December 31, 2004.

7. Attached hereto as Exhibit 5 is a true and correct copy of the JPMorgan Chase account statement for Bernard L Madoff Investment Securities, account ending in -509, from March 1 through March 31, 2006.

8. Attached hereto as Exhibit 6 is a true and correct copy of the JPMorgan Chase account statement for Bernard L Madoff Investment Securities, account ending in -509, from March 1 through March 30, 2007.

9. Attached hereto as Exhibit 7 is a true and correct copy of the JPMorgan Chase account statement for Bernard L Madoff Investment Securities, account ending in -509, from September 29 through October 31, 2007.

I declare under penalty of perjury that the foregoing is true and correct, pursuant to 28 U.S.C. §1746(2).

Date: New York, New York
March 27, 2019

/s/ David J. Sheehan

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